

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION**

ZHANG YONGJUN, an individual resident of California; YAN JINGQI, an individual resident of California; ZHENG CAIWEN, an individual resident of California; and WANG XINPING, an individual resident of California

Plaintiffs,

vs.

SDRC, INC., a South Dakota corporation; SD INVESTMENT FUND LLC 6, a South Dakota limited liability company; and JOOP BOLLEN, an individual resident of South Dakota,

Defendants and Third Party Plaintiffs,

vs.

HENRY ZOU, an individual resident of the People's Republic of China; and HENRY GLOBAL CONSULTING GROUP a/k/a HENRY GLOBAL a/k/a HENRY GLOBAL GROUP a/k/a HENRY GLOBAL CONSULTING USA, incorporated under the laws of the People's Republic of China,

Third Party Defendants.

Case No. 11-cv-4148-KES

**SUMMONS OF A THIRD-PARTY  
COMPLAINT**

To Henry Zou, HGCG China Beijing headquarters, 16th Floor, Taikang Financial Tower, No.38 Dongsanhuan North Road, Chaoyang District, Beijing, China. 100026 and HGCG U.S. headquarters, 1609 West Valley Boulevard, Suite 300, Alhambra CA 91803.

A lawsuit has been filed against Defendants SDRC, INC., SD INVESTMENT FUND LLC 6, and Joop Bollen, who as Third-Party Plaintiffs are making this claim against you to pay part or all of what the Defendant may owe to the Plaintiffs Zhang Yongjun; Yan Jingqi; Zheng

Caiwen, and Wang Xinping and to pay damages to Defendants for their own injuries caused by your actions.

Within 21 days after service of this summons on you (not counting the day you received it) –or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3)—you must serve on the Plaintiffs and on the Defendants an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the Defendants or Defendants’ attorneys whose name and address is:

Mr. Jeffrey T. Sveen  
Siegel, Barnett & Schutz, LLP  
415 S. Main Street; 400 Capitol Bldg.  
PO Box 490  
Aberdeen, SD 57401  
[jsveen@sbslaw.net](mailto:jsveen@sbslaw.net)

It must also be served on the Plaintiffs or the Plaintiffs’ attorneys whose names and addresses are:

Mr. Vince M. Roche  
Mr. Shane E. Eden  
206 West 14<sup>th</sup> Street  
PO Box 1030  
Sioux Falls, SD 57101-1030  
[vroche@dehs.com](mailto:vroche@dehs.com)  
[seden@dehs.com](mailto:seden@dehs.com)

Mr. John Grossbart  
Mr. Anthony T. Eliseuson  
Ms. Maria L. Domanskis  
223 South Wacker Drive, Suite 7800  
Chicago, IL 60606  
[John.grossbart@snrdenton.com](mailto:John.grossbart@snrdenton.com)  
[Anthony.eliseuson@snrdenton.com](mailto:Anthony.eliseuson@snrdenton.com)  
[Maria.domanskis@sbrdenton.com](mailto:Maria.domanskis@sbrdenton.com)

If you fail to respond, judgment by default will be entered against you for the relief demanded in the Third-Party Complaint. You also must file the answer or motion with the court and serve it on any other parties.

A copy of the Plaintiffs' Amended Complaint is also attached. You may, but are not required to, respond to it.

Dated: 1/18/12

CLERK OF COURT:

J. H. by  
Sumner Wahyud  
Signature of Clerk or Deputy Clerk